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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**-oOo-**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL STEVEN SANDFORD,

Defendant.

Case No.: 2:16-cr-198-JCM-VCF

**Stipulation to Continue  
Government Response to Defense  
Motion to Suppress (ECF #23)**  
(First Request)

**IT IS HEREBY STIPULATED AND AGREED**, by and between Daniel G. Bogden, United States Attorney, and Jared L. Grimmer, Assistant United States Attorneys, counsel for the United States, and Brenda Weksler, Assistant Federal Public Defender, counsel for defendant MICHAEL STEVEN SANDFORD, that the government's response date for the defendant's Motion to Suppress Statements (ECF #23) currently set for September 9, 2016, be continued for two weeks. The parties are currently in plea negotiations and seek to resolve this matter. If a plea is agreed to between the parties it will eliminate the need for a response to the motion and will conserve resources of the government and this Court. This is a joint recommendation of this Court by both parties.

1 This is the first request for continuance of a response date filed herein by  
2 Counsel.

3 DATED this 6<sup>th</sup> day of September, 2016.

4 Respectfully submitted,

5 DANIEL G. BOGDEN  
6 United States Attorney

7 /s/

/s/

8 BRENDA WEKSLER  
9 Assistant Federal Public Defender  
Counsel for Defendant Sandford

JARED L. GRIMMER  
Assistant United States Attorney

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4 **UNITED STATES DISTRICT COURT**  
5 **DISTRICT OF NEVADA**

6 **-oOo-**

7 UNITED STATES OF AMERICA, )

8 Plaintiff, )

9 vs. )

10 )  
11 MICHAEL STEVEN SANDFORD, )

12 Defendant. )  
13 \_\_\_\_\_ )

Case No.: 2:16-cr-198-JCM-VCF

**FINDINGS OF FACT AND ORDER  
TO CONTINUE DATE OF  
GOVERNMENT'S MOTION  
RESPONSE DATE**

14 **FINDINGS OF FACT**

15 Based on the pending Stipulation of counsel, and good cause appearing  
16 therefore, the Court finds that the government's response date to the defendant's  
17 Motion to Suppress Statements (ECF #23) currently set for September 9, 2016, be  
18 continued for two weeks, as requested jointly by the parties to this matter.

19 **ORDER**

20 **IT IS THEREFORE ORDERED** that the government's response to defense  
21 motion be continued to September 23, 2016.  
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23 DATED 7th day of September, 2016.  
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26 **UNITED STATES MAGISTRATE JUDGE**